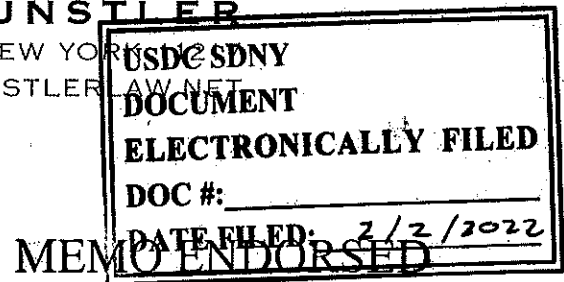


LAW OFFICE OF SARAH KUNSTLER315 FLATBUSH AVENUE #103 • BROOKLYN, NEW YORK 11217
(718) 783-3682 • FAX (347) 402-2014 • KUNSTLER-LAW.NET

February 2, 2022

The Honorable Lewis A. Kaplan
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007



Re: United States v. Philip Reichenthal
 20 Cr. 00578 (LAK)

Dear Judge Kaplan:

I write to inform your Honor that the parties have reached an agreement on a plea for Mr. Reichenthal. Given Mr. Reichenthal's multiple illnesses and physical limitations, and the dangers of COVID-19 to someone in his condition, he cannot travel to New York to enter his guilty plea, and we respectfully request the Court's permission to conduct the plea remotely pursuant to the CARES Act. Enclosed, for the Court's review, is a proposed CARES Act order. The government consents to a remote plea.

Mr. Reichenthal is battling cancer, the breadth of which is still undetermined, as well as a complement of other conditions including spinal stenosis, spinal fractures, polycythemia, and heart disease. Mr. Reichenthal has undergone surgery to remove the cancer from one of his kidneys and is awaiting surgery on the other. This past Fall, he underwent surgery on his cervical spine, which unfortunately resulted in a worsening of his chronic spinal pain. He also suffers from dizziness, balance issues, and suspected cognitive impairment, which his psychiatrist is in the process of evaluating.

Given his multiple conditions, which have left him with short periods of focus and the need for frequent breaks, it would be much easier to help him prepare for, and enter, his plea if we could physically be in the same room, albeit with appropriate precautions to protect Mr. Reichenthal's health. Such physical presence will ensure that I can provide him with the effective assistance of counsel to which he is entitled. Additionally, Mr. Reichenthal and I have only spoken remotely – but we have never met.

In order to accomplish this remote plea, I request CJA funds to travel to Miami, Florida. Specifically, I respectfully request that your Honor authorize the expenditure of CJA funds for round trip airfare between New York City and Miami, one night at a hotel, and a rental car. I anticipate that the total expense will be under \$1000.

Appraised
 SO ORDERED

Lewis A. Kaplan
 LEWIS A. KAPLAN, USDJ

2/2/22